

ROTHKEN LAW FIRM  
IRA P. ROTHKEN (160029)  
3 Hamilton Landing, Suite 280  
Novato, CA 94949  
Telephone: 415/924-4250  
415/924-2905 (fax)  
[ira@techfirm.com](mailto:ira@techfirm.com)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
STUART A. DAVIDSON  
MARK DEARMAN  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
561/750-3364 (fax)  
[sdavidson@rgrdlaw.com](mailto:sdavidson@rgrdlaw.com)

GARDY & NOTIS, LLP  
JENNIFER SARNELLI (242510)  
560 Sylvan Avenue, Suite 3085  
Englewood Cliffs, NJ 07632  
Telephone: 201/567-7377  
201/567-7337 (fax)  
[jsarnelli@gardylaw.com](mailto:jsarnelli@gardylaw.com)

KIRTLAND & PACKARD LLP  
BEHRAM V. PAREKH (180361)  
2041 Rosecrans Avenue, Third Floor  
El Segundo, CA 90245  
Telephone: 310/536-1000  
310/536-1001 (fax)  
[bvp@kirtlandpackard.com](mailto:bvp@kirtlandpackard.com)

*Co-Lead Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IN RE APPLE IPHONE 4 PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

MDL Docket No. 10-2188 (RMW)

DECLARATION OF IRA P. ROTHKEN IN  
FURTHER SUPPORT OF MOTION FOR FINAL  
APPROVAL OF SETTLEMENT AND IN  
RESPONSE TO OBJECTIONS TO THE PROPOSED  
SETTLEMENT

DATE: July 13, 2012  
TIME: 9:00 A.M.  
CTRM: 6 - 4th Floor  
Judge: Hon. Ronald M. Whyte

DECLARATION OF IRA P. ROTHKEN IN FURTHER SUPPORT OF MOTION FOR FINAL APPROVAL AND  
IN RESPONSE TO OBJECTIONS TO THE PROPOSED SETTLEMENT

1 I, Ira P. Rothken, hereby declare:

2 1. I am an attorney at law duly licensed to practice in all of the courts of the state of  
3 California, and I am the founder of the Rothken Law Firm, which along with 3 other firms, was  
4 appointed Co-Lead Counsel in this class action. The facts set forth herein are of my own personal  
5 knowledge. If called to testify I could and would testify competently thereto.

6 2. Attached hereto as Exhibit A is a true and correct copy of the Declaration of  
7 Honorable Daniel Weinstein, and Catherine Yanni, Esq. in further support of the Final Approval  
8 of the proposed Settlement.

9 3. Attached hereto as Exhibit B are true and correct copies of declarations of the  
10 Class Representative in support of final approval of the proposed Settlement.

11 4. Attached hereto as Exhibit C are true and correct copies of objections not  
12 previously docketed in the above captioned action.

13 5. Attached hereto as Exhibit D is a true and correct copy of a chart created by Co-  
14 Lead Counsel detailing the exclusion requests received.

15 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct and that this declaration was executed on this 29<sup>th</sup> Day of June,  
17 2012.

18 /s/ Ira P. Rothken  
19 IRA P. ROTHKEN  
20 ROTHKEN LAW FIRM  
21 3 Hamilton Landing, Suite 280  
22 Novato, CA 94949  
23 Telephone: (415) 924-4250  
24 Facsimile: (415) 924-2905  
25 ira@techfirm.com  
26  
27  
28

**Certificate of Service  
and  
Declaration Pursuant to General Order No. 45.VI.E**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 30th day of June, 2012, with a copy of this document via the Court's CM/ECF system. I certify that all parties who have appeared in this case are represented by counsel who are CM/ECF participants.

This document was not filed via CM/ECF on the June 29, 2012 due date due solely to such technical failures of the Court's CM/ECF system. Pursuant to **GENERAL ORDER NO. 45.VI.E**, I declare that my failed attempts to file electronically were made at least two times after 12:00 noon separated by at least one hour on June 29, 2012 due to such technical failure.

/s/Jared R. Smith

Jared R. Smith